

# NULLARBOR UPDATE

By Stefan and Bronwen Eberhard

## EPA Referral of Western Energy Hub 11 November 2024

On Monday 11th Nov 2024 the Environmental Protection Authority (EPA) Western Australia (WA) released the Environmental Impact Assessment (EIA) Section 38 Referral Supporting Document for the Western 'Green' Energy Hub (WGEH).

In this Stage 1 of the EIA process the EPA invited individuals and organisations to register their interest in this referral, and to recommend the level of assessment, including succinct reasons for the recommended level (not exceeding 500 words). The seven-day comment period (viz. to determine the level of assessment) on this referral closed Sunday 17 Nov 2024.

The levels of assessment range from 'no assessment required' up to the highest level of assessment which is that of 'Public Environmental Review' (PER). For a proposal of this scale and consequence the highest level of assessment would be anticipated by the proponent.

The Section 38 Referral Supporting Document for the Western Energy Hub can be viewed here (look under the Referral menu at bottom of page): <https://www.epa.wa.gov.au/proposals/western-green-energy-hub>

### **Serious deficiencies in WGEH's Referral Supporting Document:**

WGEH's 124-page Referral Supporting Document-26 manifests a serious failure to comprehend the true nature of, and potential impact upon, several key environmental and social factors which are of profound relevance, and which stand to suffer irreparable harm, if this proposed development is allowed to proceed. The document makes several claims which ring loud alarm bells.

Irrespective of even the most strident commitments to impact avoidance, mitigation and rehabilitation, and even if such measures are made legally enforceable under EPA Conditions of Approval, this colossal industrial venture would wreak unavoidable harm - environmental, cultural and social – not only within the proposed development footprint, but very importantly, across the entire Nullarbor region and Great Australian Bight. In our opinion it should not be constructed on any part of the Nullarbor limestone karst region or incised into the middle of the Great Australian Bight marine national parks.

### **EPA determines level of assessment as 'Public Environmental Review'**

On the 25th November the EPA WA announced the EIA level of assessment for the Western 'Green' Energy Hub (WGEH) will be set at the highest level of assessment, that of Public Environmental Review (PER).

This outcome was expected considering the scale of the project and its potential impact to outstanding natural and cultural heritage values.

Nonetheless it was very encouraging to see that 282 public submissions were made to the EPA despite the short 7-day period, and the vast majority (92%) of submissions recommended the proposal be subject to PER, the highest level of public scrutiny. Numerous WA Referrals slip under the public radar and may only receive a handful of submissions. The high number of submissions was undoubtedly a consequence of widespread media coverage and behind the scenes efforts to spread the word and encourage submissions from members of the public who would not otherwise monitor or subscribe to EPA Referrals.

It was encouraging to see that the EPA had taken heed of at least a few of the serious deficiencies evident in the WGEH supporting document-26, which were spotlighted in the public submissions. For example, three key environmental factors not considered important by WGEH were added by the EPA as preliminary key environmental factors for consideration, namely: landforms, subterranean fauna, and inland waters.

Due to the scale and complexity of the issues involved with this EIA, the EPA set an extended public review period of 10 weeks - many review periods are much shorter than this. PER document(s) can be thousands of pages in length and encompass numerous appendices holding subconsultants reports. The proponent will prepare and submit the PER document to the EPA, the EPA will review it internally, and may request more information from the proponent before it is released for PER. The time when this will happen is unknown, however it could be many months away.

The public record extract of determination can be viewed here (look under the Referral 2 menu at bottom of page): <https://lnkd.in/gV5aSrTh>

The EPA Steps through the assessment process explained here: <https://lnkd.in/gZGmhRhh>

To keep informed, and contribute to the public review process, you can subscribe for email updates from the EPA: <https://lnkd.in/gNs23BH5>

Despite the restrictive seven-day comment period, 182 public submissions were received by the EPA.

### Proposed WGEH footprint increased by 46% land area with 60 million solar panels

In their referral documents the WGEH finally made public their proposal to industrialise a much larger land area than they had been promoting on their website for the previous two years or so. The now finally declared footprint is around 46% larger, from ~15,000 square kilometres to > 22,000 square kilometres. This is almost one-third of the area of Tasmania. In addition, the declared number of solar panels has more than doubled, from 25 million to 60 million panels.

The map published in the previous ACKMA journal is therefore out of date and two updated maps are presented below.

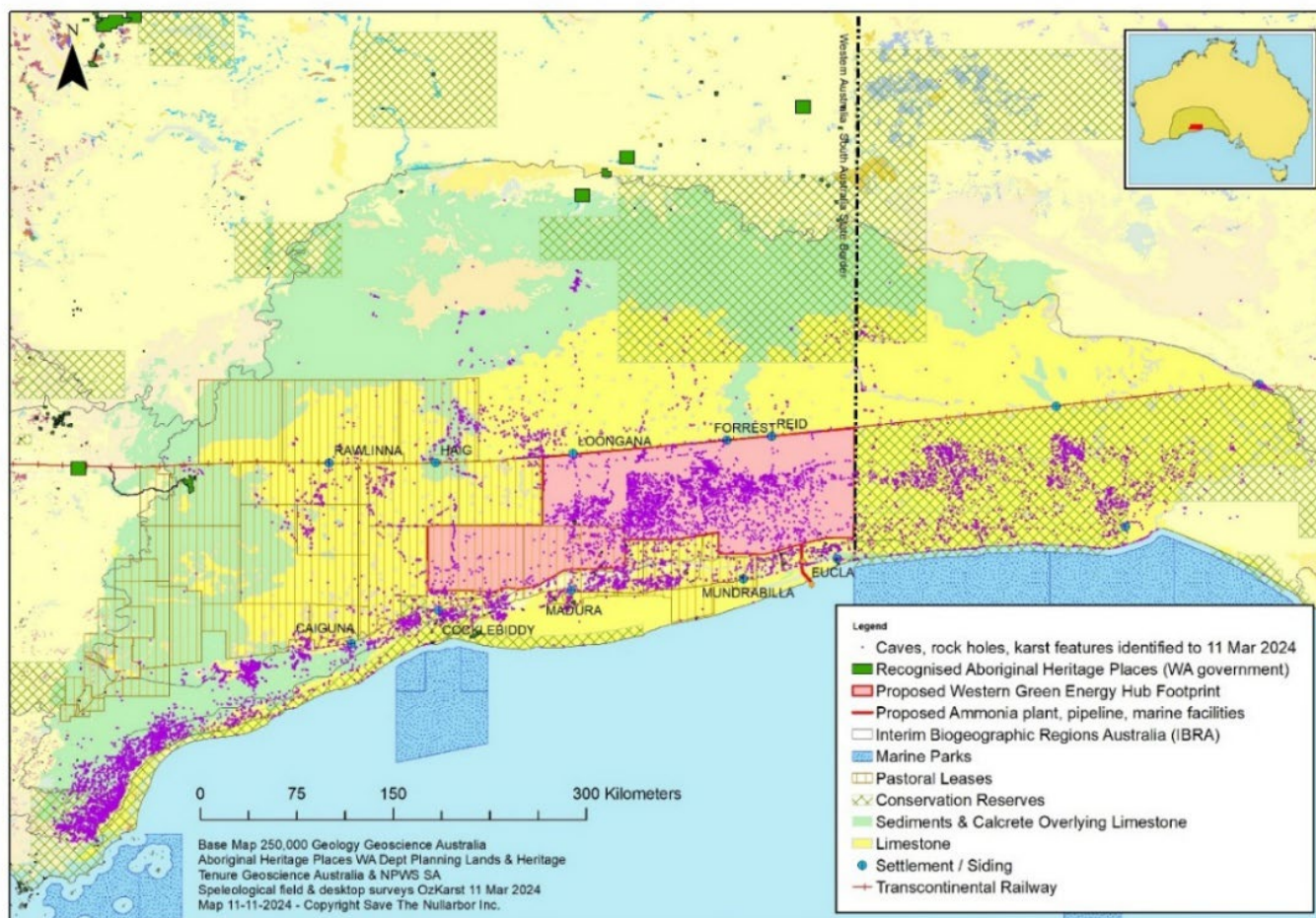
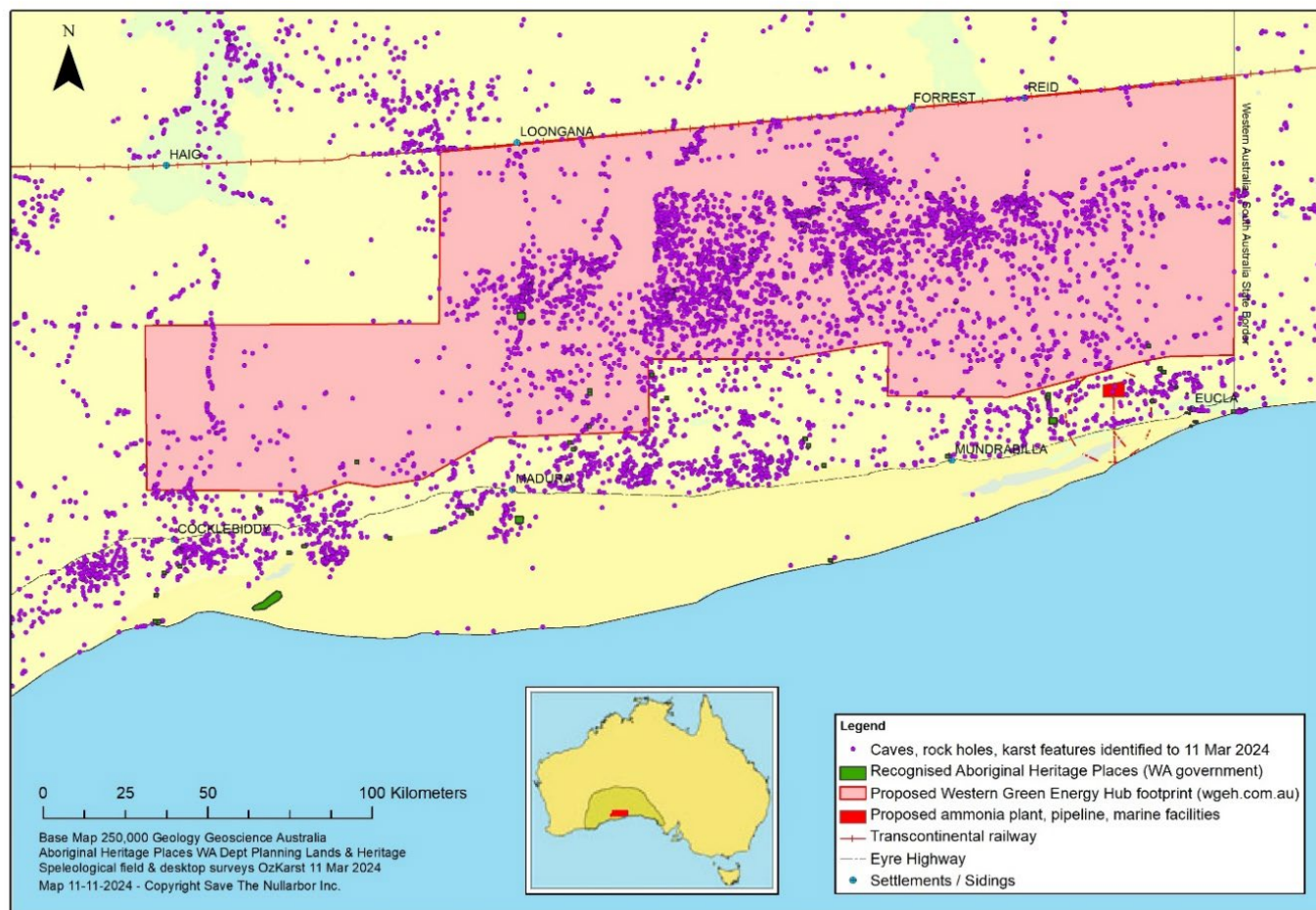


Figure 1: Nullarbor IBRA, tenure, karst features, proposed WGEH, data sources as indicated (above)

Onshore portion of the Eucla Basin showing the extent of Nullarbor limestones (bright yellow and green) which coincide with the Nullarbor and Hampton biogeographic regions (IBRA). Also shown are reserves, marine parks, pastoral leases, settlements, transcontinental railway, and State border. The proposed 22,000 km<sup>2</sup> Western Green Energy Hub footprint (red shading) sits atop the central portion of the karst which contains a notably high density of recorded karst features including many highly important and sensitive caves.

Across the entire Nullarbor, more than 13,000 karst features (purple dots) have been recorded during 70 years of exploration by Australian speleologists. Large portions of the limestone remain unexplored for karst features. The high density of recorded features in the central portion of the karst coincides with concentrated and systematic exploration efforts by speleologists in recent decades (= sampling bias) and thus the apparent lower density of features west, east, and north of the proposed WGEH footprint almost certainly under-represents the true density of features across the Nullarbor. This interpretation is supported by the obvious alignment and clustering of recorded features alongside vehicle tracks and around settlements. Similarly, the high density of features identified in the southwest corner (Mardabilla Plain) is the result of intensive air photo study of this portion of the plain.

Figure 2: Nullarbor karst central portion, recorded karst features, proposed WGEH, data sources as indicated (below)



Inside the proposed Western Green Energy Hub development footprint, more than 4,500 karst features have been recorded, including > 400 caves, > 500 rock holes, > 1900 blowholes, and > 1470 dolines (sink holes). The large blank areas on the map do not mean there are no caves or karst features present, only that cavers and speleologists have not yet searched these areas.

### Media coverage since 11th November 2024

The EPA put out a media statement announcing the Section 38 Referral of the WGEH on 11<sup>th</sup> November. WGEH also put out a media statement the same day, which is available on their website.

On the 12<sup>th</sup> November, Save The Nullarbor circulated a detailed media statement that can be viewed here: <https://savethenullarbor.org/media-articles/media-release/>

Separately from this we were contacted for an interview by ABC radio WA. Parts of this interview were used in radio news around WA during that week. The story was picked up by other media providers, which cascaded into a succession of newspaper articles and radio stories around Australia over the following four weeks. It was heartening to see that most of the media coverage gave fair and reasonable space to the cause for looking after the Nullarbor, albeit a great deal of time and effort, with follow-up, was put into ensuring that reporters had all the facts and plenty of photos.

The most pleasing media outcome was making the front page of The Australian newspaper, with a memorable headline – “Like dropping a brick on a meringue” – for which Kevin Kiernan must be acknowledged as the conceiver of this vivid metaphor. Notwithstanding, this metaphor has subsequently generated some negative feedback which had to be defended on live radio. The day following The Australian editorial contained a paragraph titled “‘Preserve underground wonderland’ and ending with this statement:

*'It is too rich a heritage sacrifice for energy technology that may not stand the test of time. If destroyed, the caves beneath the Nullarbor would be irreplaceable.'*

The less sensationalist, and more detailed, coverage given in the smaller regional newspapers, such as Farm Weekly, Kalgoorlie Miner and Eyre Peninsula Advocate, was very encouraging. It is becoming clear that many local people in the Eyre Peninsula region, SA, and Dundas Shire, WA, are very concerned about the proposed energy hub and the indirect impacts it could have on their lifestyle and farming livelihoods.

Kalgoorlie Miner reported: *‘Shire of Dundas president Laurene Bonza said the project would be an “absolute headache” from a town planning perspective, given the shire’s current population is about 720. The logistics of putting 8,000 people out there, it’s bigger than my head can get around’, she said. There are certainly some concerns as far as town planning, and there are environmental concerns. I think the people out here are quite anxious about it... those people that live out at Eucla, there’s about 50 of them, that’s a significant impact on their life.’*

On ABC radio, Brad Pettitt, WA Greens MLC said

*"We are hugely supportive of renewable as the Greens, but what we don't want to see is that come at the cost of pretty unique natural places because it doesn't need to. This is not really about decarbonising the West Australian economy or stopping fossil fuels. It's a huge play on a speculative future around whether green hydrogen can be made to work or not. Let's get on and do renewable energy where it matters right now, connected to the West Australian grid, decarbonising the State rather than kind of pretending that green hydrogen is going to solve all our problems."*

Most of the recent media stories and radio interviews are available here:

<https://savethenullarbor.org/media-articles/published-media/>

## THE AUSTRALIAN



### **‘Like dropping a brick on a meringue’: scientists step up to save the Nullarbor**

**A subterranean treasure of ancient caves and lakes beneath the Nullarbor Plain is too precious to lose, scientists say. Can this fragile, hidden world coexist with an enormous renewables hub?**

## Social Media

Over the last few months, routine posting of photographs, educational text, petition updates and news articles, has continued on #savethenullarbor Instagram and Facebook. Engaging, and hopefully effective, new messaging content, conceived and put together by Bronwen, was introduced in the form of short split reels featuring simultaneous aerial and cave diving footage with Mirning audio recorded on Country this winter. These reels proved instantly popular with more than 1000 views in under 2 days and over 3000 views in the first week. You can watch them here:

<https://www.facebook.com/reel/918344566421561>

[https://www.facebook.com/61553504681167/videos/839803631994639/split\\_reel\\_1](https://www.facebook.com/61553504681167/videos/839803631994639/split_reel_1)

## Petition

Another milestone has been reached and the petition now has more than 15,000 signatures, catalysed by the widespread media coverage during November. Additional signatures were solicited at the CCWA annual conference in Perth during November. Petition forms for hand-signing have also been placed at supportive venues in Penong and Ceduna in South Australia. Any ACKMA members, tourist cave managers / guides who would like to help the cause by gathering signatures please get in touch via [admin@savethenullarbor.org](mailto:admin@savethenullarbor.org).

## Conservation Council of Western Australia

The Conservation Council of WA (CCWA) is Western Australia's foremost not-for-profit, non-government conservation and environment organisation. CCWA have been a prominent and forthright voice for conservation for more than 50 years working directly with communities, government, Traditional Owners, industry, and media to promote a more sustainable WA and to protect the natural environment.

The CCWA supports a membership of more than 80 community organisations with a commitment to nature conservation and environmental protection. Save The Nullarbor Inc.'s (STN) application for membership was approved in May this year. The CCWA annual conference was held in Perth in November, and CCWA kindly provided a space for the display of two large banners, posters, cards, and petition. Until recently the WGEH proposal has flown beneath the radar of most people in WA and the CCWA conference was a great opportunity to promote the Nullarbor conservation issue across environmentally conscious community groups in this state.

## Posters

A set of campaign posters have been produced which can be printed on demand at A2-size or smaller. If anyone would like to purchase and/or display one or more of these posters in a location where they will be seen please get in touch. The cost depends on the print material and protective finish. All profits from poster sales go towards the Nullarbor campaign.

## Membership

Applications for STN membership are welcome. Annual subscription is only \$AUD 20. Email [admin@savethenullarbor.org](mailto:admin@savethenullarbor.org).

There is a secure "Join Us" button on Save The Nullarbor website where you can subscribe for occasional email updates and newsletters. Personal data is held securely. [www.savethenullarbor.org](http://www.savethenullarbor.org)

## Donations

Save The Nullarbor Inc. is seeking donations to support ongoing efforts to raise public awareness about the values and looming threat to the Nullarbor. Donations can be made via the secure website button or contact us directly by email: [admin@savethenullarbor.org](mailto:admin@savethenullarbor.org)

## More Information

Links to the petition, website, sizzle reels, news articles, media releases and social media are in the Linktree below: <https://linktr.ee/savethenullarbor>

